

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

MISTY BLANCHETTE PORTER, M.D.,

Plaintiff,

vs.

Case No. 5:17-cv-194

DARTMOUTH-HITCHCOCK MEDICAL
CENTER, DARTMOUTH-HITCHCOCK
CLINIC, MARY HITCHCOCK
MEMORIAL HOSPITAL, and
DARTMOUTH-HITCHCOCK HEALTH,

Defendants.

**PLAINTIFF'S RESPONSE TO DEFENDANT MARY HITCHCOCK MEMORIAL
HOSPITAL'S FIRST SET OF INTERROGATORIES PROPOUNDED ON PLAINTIFF
MISTY BLANCHETTE PORTER**

Plaintiff Misty Blanchette Porter, M.D., ("Plaintiff" or "Dr. Porter"), pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure and by and through her counsel, Katherine B. Kramer, Esq., of Katherine Burghardt Kramer Law Office PLLC, and Geoffrey J. Vitt, Esq., of Vitt & Associates PLC, responds as follows to Defendant Mary Hitchcock Memorial Hospital's First Set of Interrogatories to Plaintiff.

Defendants' Interrogatories and Plaintiff's Responses

1. Identify each and every element of damages you allege to have suffered as a result of Defendants' alleged unlawful conduct, and for each element, please separately state the monetary value you assign to it and explain how you arrived at that figure, including in your explanation a statement of all premises, figures and/or assumptions underlying such figure(s).

Response: Plaintiff will supplement this response. Plaintiff has retained an economic expert and will produce an expert report regarding her economic loss. Without waiving the right to supplement, Plaintiff identifies the following categories of damages:

- **Reduced retirement benefits**
- **Loss of fringe benefits (e.g., health insurance coverage, accrued vacation benefits)**
- **Reduced income**
- **Cost of purchasing a second residence in Burlington closer to new employment, plus fees, renovation expense, utilities, costs of setting up a second residence (furnishings, household goods, appliances, etc.)**
- **Financial loss resulting from delay in academic promotion, along with professional reputational loss**
- **Emotional harm and non-economic loss**
- **Attorney's fees and costs of litigation**

2. State the amount of any loss of wages, income, or benefits you are claiming as a result of this lawsuit, and state with respect thereto:


- a. The total gross and net amount of each alleged loss;
- b. The method by which you computed the amount of the loss; and
- c. Identify each person who assisted you in computing or calculating such alleged loss.

Response: Plaintiff will supplement this response. Plaintiff has retained an economic expert, Robert L. Bancroft, Ph.D., to assist in calculating her economic loss and will produce an expert report.

3. Identify each and every entity or person for whom you have performed work or professional services, whether as an employee, consultant, or contractor, since November 1, 2015, including, if applicable, self-employment, and provide the following information related to each entity or person:

- a. Name and address of the entity or person;

DATED at Norwich, Vermont, in the County of Addison, this 20th day of April 2018.

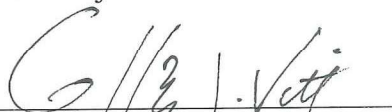

Misty Blanchette Porter, M.D.
Plaintiff

STATE OF VERMONT
COUNTY OF WINDSOR, SS.

Subscribed and sworn to me this 20th day of April, 2018.

Before me: 
Notary Public
Commission Expires: 2/10/2019

As to objections:


Geoffrey J. Vitt, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2018, I caused a true copy of the above document to be served upon the attorneys of record for Defendants via electronic mail and first-class mail.

/s/ Geoffrey J. Vitt
Geoffrey J. Vitt